

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 55(b) and Local Civil Rule 55.2, and based upon the accompanying: (1) memorandum of law in support of this motion and (2) declaration of Bryan N. DeMatteo in support of this motion with accompanying Exhibits A through K, together with all the pleadings and proceedings heretofore had herein, LHF Productions, Inc. (“LHF”) hereby moves the Court to enter a default judgment in favor of LHF and against defendants PAULA NEWMAN and SHANIKA BELGRAVE on the grounds that said defendants failed to answer or otherwise defend against the Amended Complaint. In accordance with Local Civil Rule 55.2, attached to this motion are copies of the Clerk’s

Certificate of Default (D.I. 35), a copy of the Amended Complaint (D.I. 18) and a proposed form of default judgment.

Dated: March 15, 2017

Respectfully submitted,

DEMATTEO LAW, PLLC

/s/ Bryan N. DeMatteo
Bryan N. DeMatteo (BD 3557)
bryan@demfirm.com
DEMATTEO LAW, PLLC
830 Third Avenue, 5th Floor
New York, NY 10022
Tel.: (866) 645-4169
Fax: (732) 301-9202
Attorneys for Plaintiff
LHF Productions, Inc.